

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 CES Environmental Services, Inc. - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region VI

Subject: POLREP #2
 Progress (DRAFT)
 CES Environmental Services, Inc.

Houston, TX
Latitude: 29.6984000 Longitude: -95.3435000

To: Ronald D. Crossland, USEPA Superfund Division - PRB
 Anthony Buck, TCEQ
 Reggie Cheatham, USEPA Headquarters

From: Gary Moore, FOSC

Date: 2/27/2015

Reporting Period: September 3, 2014 - February 27, 2015

1. Introduction

1.1 Background

Site Number:	A6JP	Contract Number:	
D.O. Number:		Action Memo Date:	8/26/2014
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/3/2014	Start Date:	9/3/2014
Demob Date:		Completion Date:	
CERCLIS ID:	TXD008950461	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical

1.1.2 Site Description

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. The Site is under the control of the Bankruptcy Court where a Trustee was appointed to administer the CES Environmental Services, Inc. Estate. The Estate does not have the funding necessary to address the multitude of environmental conditions at the site. The site consists of approximately 6 Buildings, 11 Vacuum Boxes, 2 Roll-off Boxes, 12 Frac Tanks, 2 Tanker Trailers, 23 Aboveground Storage Tanks (ASTs), 20 Waste Water Treatment Tanks, Waste Piles, and numerous sumps, totes, vats, drums, and smaller containers. There has been spillage of chemicals to exterior surfaces as well as building interiors. The facility has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills in March and July 2014 have occurred due to theft and vandalism which has resulted in the dumping of chemical wastes to the ground surface and spillage and runoff into an adjacent residential neighborhood to the South of the facility. Emergency responses and cleanup activities to these spills have involved the Estate, City of Houston, Texas Commission on Environmental Quality (TCEQ), and the EPA.

1.1.2.1 Location

4904 Griggs Road
 Houston, Harris County, Texas 77021
 Latitude: 29.6984
 Longitude: -95.3435

1.1.2.2 Description of Threat

The Site is situated in a residential/commercial area. The site is bordered by primarily residential properties and a charter school along with several commercial properties. Releases of chemicals from the site have been documented into residential areas south of the site as a result of previous spills. These spills have been cleaned up but residual contamination likely remains and will need to be further investigated. Additionally, the area is saturated with phenolic odors believed to be associated with several of the vacuum boxes and historic releases from these containers.

The primary threat associated with the site is the potential exposure to the surrounding populations from releases from the containers located on the site. Additionally, stormwater could carry materials spilled or materials already spilled off-site impacting both the residential populations and the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The site is abandoned and has been significantly vandalized since 2010. Roll-off boxes and Tank Trailers have been stolen from the site and chemical wastes have been deposited in other on-site containers, secondary containment areas, and on the ground surfaces. Additionally, containers have deteriorated, continue to deteriorate and have leaked chemicals to the ground surfaces. The site has approximately 11 vacuum boxes, 2 roll-off boxes, 12 frac tanks, 2 Tanker Trailers, 23 Aboveground Storage Tanks (ASTs), 20 Waste Water Treatment Tanks, Waste Piles, and numerous totes, vats, drums, and smaller containers. The site currently floods during rainfall events as on-site storm drains have been plugged. A one inch rainfall event results in approximately 200,000 gallons of stormwater. Stormwater from a portion of the site drains into the neighborhood to the South of the facility through early August 2014 at which time the City of Houston and the TCEQ blocked drainage (diking) from continuing to drain into the residential neighborhood through normal site drainage routes. Stormwater continues to drain off-site into the storm drain at the northwest side of the facility as heavy rains cause the pooled areas to reach capacity and overflow.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The EPA transitioned to spill response activities and into a removal assessment on the facility in late August 2014. On September 3, 2014, EPA activated its cleanup contractors to begin removal activities as assessment activities continued due to the what EPA believed was an imminent and substantial endangerment to the surrounding population.

As of February 27, the EPA Team has addressed the following:

Vacuum Boxes (original): Wastes contained in the original 11 vacuum boxes have been transferred into shippable vacuum boxes and off-site for disposal (Trustee addressed 1 of these vacuum boxes). All original vacuum box containers have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Roll-Off Boxes (original): Wastes contained in the original 2 roll-off boxes have been disposed (Trustee addressed 1 roll-off box). All original roll-off boxes have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Frac Tanks (original): Waste removed from 8 of 12 frac tanks (3 of 12 were originally empty). Wastes in 1 of the original frac tanks (FT1004) has not been yet been addressed as the disposal company was unable to receive the waste due to strong chemical odors. On-site treatment with off-site disposal for the material is expected in early March. Four (4) of the emptied frac tanks that were originally rented by CES Environmental Services during their operations were released back to those rental companies (1 to Dynamic Rental Systems, 4 to Dana Transport). The remaining frac tanks will remain on-site for anticipated cleanup operation waste storage (4 CES, 3 Dana Transport).

Aboveground Storage Tanks (ASTs): Liquids and sludge have been removed from 19 of 20 steel ASTs. One (1) steel AST and three (3) Poly Tanks remain to be addressed. The one (1) steel AST is awaiting waste disposal facility acceptance. The three (3) Poly Tanks will be addressed along with similar waste streams located within drums/totes/miscellaneous containers.

Waste Water Treatment Tanks (WWTT): Liquids and sludge have been removed from 16 of 20 WWTTs. The remaining tanks consist of one (1) tank containing lime, two (2) tanks containing acid, and one (1) tank containing neutral liquid. Prior to beginning Waste Water Tank removal, the secondary containment required liquid and solid removal. The secondary containment is substantially complete but additional and periodic cleaning will be necessary due to rainfall into the building as well as drips/leaks from cleanup operations.

Totes/Drums/Vats/Misc Containers: Empty containers have been segregated for cleaning (pressure washing). Full/Partially Full containers have been sampled, field characterized and currently being segregated into appropriate waste streams to be bulked, sampled, and properly containerized for disposal. There are approximately 8 poly tanks, 2 Vats, and 150 totes/drums with materials to be addressed. Additionally, there are approximately 166 RCRA empty totes/drums to be addressed.

Removal of Contaminated Sediments/Solids: General cleaning of visibly contaminated areas causing a sheen on storm water has been completed. The cleaning of stained areas will continue to the extent possible but is not a high priority unless it is causing a sheen on the storm water. Silt barriers and oil absorbent boom are in place to reduce sediment and hydrocarbon releases to storm water drains during a rain event.

Loading Bays (Main Warehouse): The bays and warehouse trenches have been substantially cleared of debris and chemical wastes to the extent possible. Additional work will be necessary.

Truck Cleaning Bay: The bays have been cleaned and sludge substantially removed from trenches leading to sump. This area will be used for container cleaning activities, as necessary. Additional work will be necessary.

Storm Water Management: This activity continues as rainfall occurs. Storm water is being allowed to drain from the site through silt barriers and absorbent boom. The southern portion of the facility currently remains diked which disrupts cleanup operations after a rain event. The site is usually inundated with storm water during a rain event. A one inch rainfall adds approximately 180,000 gallons of water on the facility where approximately 60,000 gallons drains to the northern portion of the facility and 120,000 drains to the southern portion of the facility where it is currently diked. Eventually, the diked area will be opened up to allow normal storm water runoff to occur albeit through silt barriers and absorbent boom. The City of Houston has assisted EPA in allowing it to discharge the original accumulated and contaminated storm water into the City of Houston sanitary sewer and this option currently remains an option for questionable storm water issues should the need arise.

Waste Piles (Southern Portion of Facility): Trustee removed wastes dumped to the ground in March 2014 due to the theft of 7 roll-off boxes. An additional debris pile exists that is associated with the construction of the berm around the southern portion of the facility.

Lab Chemicals/Company Profile Samples: Trustee consolidated and disposed;

Bulk Process Chemicals: Trustee collected and disposed;

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The EPA and TCEQ are currently in the process of identifying Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

See attached

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The response activities will include the following:

1. Remove/Dispose of all containerized wastes;
2. Cleanup visible spilled material from soil, concrete/asphalt;
3. Manage stormwater to the extent necessary and possible;
4. Remove/Dispose of Contaminated Debris and Other Environmental Concerns as Funding Allows:

2.2.1.2 Next Steps

The remaining cleanup activities include:

Wastewater Treatment Tank Area: Sludge Removal - LIME; Piping - Remove Waste; Secondary Containment - Final Cleanup

Aboveground Storage Tank Area: Liquid/Sludge Removal - ST1; Piping - Remove Wastes; Secondary Containment - Remove contaminated Debris/Sand and conduct final cleanup;

Frac Tank Waste Disposal: Treatment/Disposal - FT1004; Disposal - Other Frac Tanks as they are filled:

Main Warehouse: Remove Trench Solids; Clean Contaminated Solids and Chemical Contamination on Flooring;

Truck Wash Bay, Shed, Former Shed: Truck Wash Bay - Remove Liquids/Solids and from Sump and Trenches and Final Clean; Shed - Remove Liquids/Solids from Sump and Drains and Final Clean; Former Shed - Remove Liquids/Solids from Sumps and Trenches and Final Clean

Poly Tanks, Totes, Vats, Drums, Misc Containers, Carbon, Supersack: Bulk content and dispose; Clean empty containers and dispose;

Large VAT South of ASTs: Remove Material (Liquids/Solids) and dispose;

Generated Wastes: Complete disposal of the generated wastes in vacuum boxes, frac tanks, roll-off boxes, etc.

2.2.2 Issues

The Site continues to emanate odors into the surrounding neighborhood from historic spillage as a result of the aromatic wastes. These odors have been reduced as a result of the EPA cleanup actions although additional odors result from the on-site processing and loading of materials for disposal. The EPA continues to attempt to minimize such odors to the extent possible.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

The cost information below reflects estimated costs through February 27, 2015.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,823,398.00	\$1,127,586.00	\$695,812.00	38.16%
START - Technical Assistance Contractor	\$150,000.00	\$79,141.00	\$70,859.00	47.24%
Contingency	\$26,602.00	\$0.00	\$26,602.00	100.00%
Intramural Costs				
Total Site Costs	\$2,000,000.00	\$1,206,727.00	\$793,273.00	39.66%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

City of Houston
Texas Commission on Environmental Quality
Texas Department of State Health Services
Agency for Toxic Substances and Disease Registry

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.